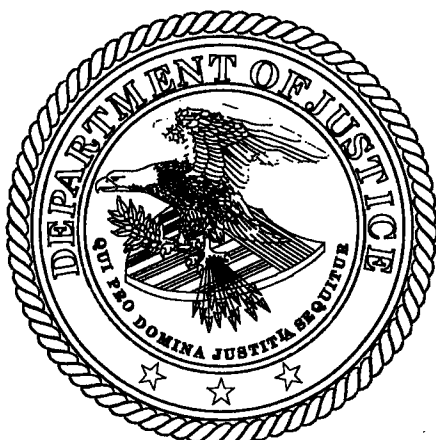


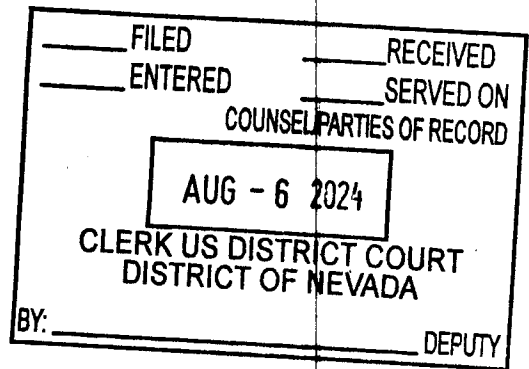
24 cr 172



SEALED

Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336

JASON M. FRIERSON
 United States Attorney
 District of Nevada
 Nevada Bar Number 7709
 LAUREN M. IBANEZ
 Assistant United States Attorney
 501 Las Vegas Boulevard South, Suite 1100
 Las Vegas, Nevada 89101
 Tel: (702) 388-6336
Lauren.Ibanez@usdoj.gov
Attorneys for the United States



**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JEREMIAH HASAN JACKSON,

and

DARRIA GRAY,

Defendants.

**SEALED
 CRIMINAL INDICMENT**

Case No.: 2:24-cr- 0172-RFB-111D C

VIOLATIONS:

Counts One through Eight:

18 U.S.C. §§ 922(a)(6) and 924(a)(2) –
 False Statement During Purchase of a
 Firearm

Count Nine:

18 U.S.C. §§ 922(a)(1)(A), 923(a), and
 924(a)(1)(D) – Engaging in the Business of
 Dealing Firearms Without a License
 (Aiding and Abetting)

Count Ten:

18 U.S.C. § 933(a)(1) – Trafficking in
 Firearms (Aiding and Abetting)

THE GRAND JURY CHARGES THAT:

COUNTS ONE THROUGH EIGHT
False Statement During Purchase of a Firearm

On or about the dates below, in the State and Federal District of Nevada,

JEREMIAH HASAN JACKSON,

defendant herein, in connection with, as described below, the acquisition of firearms from licensed dealers of firearms within the meaning of Chapter 44 of Title 18, United States Code (the "Dealers"), knowingly made and caused to be made a false and fictitious written statement to each of the Dealers, which statements were intended and likely to deceive each of the Dealers as to a fact material to the lawfulness of the sale of said firearms under Chapter 44 of Title 18, United States Code, in that JEREMIAH HASAN JACKSON did complete and execute a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record, wherein JEREMIAH HASAN JACKSON represented that he was the actual transferee/buyer of the firearms, when in fact, and as the defendant well knew, he was not the actual transferee/buyer of the firearms and was buying them for another person.

COUNT	DATE	DEALER (FEDERAL FIREARMS LICENSEE)	FIREARMS
ONE	03/17/2020	Fallout Firearms	1. Jimenez Arms J.A., .380, serial no. 445458
TWO	09/04/2020	Bargain Pawn, Inc.	1. CZ (Ceska Zbrojovka) P-1-C, .9, serial no. D187078
THREE	11/29/2021	Bargain Pawn, Inc.	1. Taurus, G2C, serial no. ACK415956 2. Canik55, TP-9\$A, serial no. 20AP02622

FOUR	12/11/2021	New Frontier Armory	1. Glock GMBH 19, .9, serial no. BCCH963
FIVE	02/17/2022	New Frontier Armory	1. Glock GMBH 41 Gen 4, .45, serial no. XSB400
SIX	2/12/2023	New Frontier Armory	1. Francolin Intl. Arms CO. Citadel Pat, .12, serial no. 21-1566
SEVEN	2/24/2023	Bargain Pawn, Inc.	1. Romarm/Cugir Mini Draco, 762, serial no. 22PMD-36604
EIGHT	1/24/2024	Bargain Pawn, Inc.	1. Glock GMBH Gen 4, serial no. BMHT774 2. Glock GMBH 17 Gen 5, serial no. BMWP175 3. Glock GMBH 17 Gen 5, serial no. BXP808

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT NINE

Engaging in the Business of Dealing Firearms Without a License

Beginning from a time unknown but no earlier than March 17, 2020, and continuing up to and including on or about April 15, 2024, in the State and Federal District of Nevada,

**JEREMIAH HASAN JACKSON and
DARRIA GRAY,**

defendant herein, aiding and abetting one another, not being a licensed dealer, importer, and manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully engaged in the business of dealing in, importing, and manufacturing firearms, and aided and

1 abetted the same, all in violation of Title 18, United States Code, Sections 922(a)(1)(A), 932(a),
2 and 924(a)(1)(D).

3 **COUNT TEN**
4 *Trafficking in Firearms*

5 Beginning from a time unknown but no earlier than March 17, 2020, and continuing up
6 to and including on or about April 15, 2024, in the State and Federal District of Nevada,

7 **JEREMIAH HASAN JACKSON and**
8 **DARRIA GRAY,**

9 defendants herein, knowingly shipped, transported, transferred, caused to be transported, and
10 otherwise disposed of firearms to another person, in and affecting interstate and foreign
11 commerce, knowing and having reasonable cause to believe that the use, carrying, and
12 possession of said firearms by the recipients would constitute a felony, all in violation of Title 18,
13 United States Code 933(a)(1).
14

15 **DATED:** this 6th day of August, 2024.

16 **A TRUE BILL:**

17
18 /S/
19 FOREPERSON OF THE GRAND JURY

20 JASON M. FRIERSON
21 United States Attorney

22 

23
24 LAUREN M. IBANEZ
25 Assistant United States Attorney
26
27
28